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19 *Attorneys for Plaintiff*
20 *501Queensland Circle, LLC*

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 501QUEENSLAND CIRCLE, LLC, a
24 California limited liability company,

25 Plaintiffs,

26 vs.

27 WALGREEN CO., an Illinois
28 corporation; OPTION CARE
ENTERPRISES, INC., a Delaware
corporation; and DOES 1 through 20,
inclusive,

Defendants.

Case No.: 5:22-cv-00815-JWH-KK

**[PROPOSED] ORDER GRANTING
STIPULATION EXTENDING
WALGREEN CO.'S TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT**

Complaint Filed: November 2, 2021
Amended Complaint Filed: April 7, 2022
Removal Date: May 13, 2022
Trial Date: TBD

TO ALL PARTIES AND THERE ATTORNEYS OF RECORD:

WHEREAS, on or about November 7, 2021 Plaintiff 501Queensland Circle, LLC (“501Queensland”) filed a Complaint against Defendants Walgreen Co. (“Walgreens”) and Option Care Enterprises, Inc. (“Option Care”) in the Superior Court for the State of California, Riverside County; and

WHEREAS, on or about April 7, 2022, 501Queensland filed an Amended Complaint;

WHEREAS, on or about May 13, 2022, Option Care removed this action from the Superior Court for the State of California, Riverside County to the United States District Court for the Central District of California; and

WHEREAS, on or about May 20, 2022, Option Care will file an Answer to the Amended Complaint; and

WHEREAS, good cause having been shown why Walgreens should be granted a continuance of its time to answer, move or otherwise plead in response to the Amended Complaint;

IT IS HEREBY ORDERED:

Defendant Walgreen Co. shall answer, move or otherwise plead in response to the First Amended Complaint no later than May 27, 2022

IT IS SO ORDERED.

Date: _____

Honorable John W. Holcomb

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California, I am over the
3 age of eighteen years and am not a party to this action; my business address is 400
4 South Hope Street, 8th Floor, Los Angeles, CA 90071, in said County and State.

5 On May 20, 2022, I served the following document(s):

6 **[PROPOSED] ORDER GRANTING STIPULATION EXTENDING
7 WALGREEN CO.'S TIME TO RESPOND TO FIRST AMENDED
8 COMPLAINT** on the parties stated below, by the following means of service:

9 Ronald K. Brown, JR.
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11 BROWN, JR.. APC
12 901 Dove Street, Suite 120
13 Newport Beach, CA 92660
14 Telephone: 949.250.3322
15 Fax: 949.250.3387

16 Walgreen Co.
17 CSC Lawyers Incorporating Service
18 Registered Agent
19 2710 Gateway Oaks Drive
20 Suite 150N
21 Sacramento, CA 95833-3502

22 *By United States Mail*

23 *By Electronic Transfer To CM/ECF
24 System*

25 ☒ **BY UNITED STATES MAIL:** I placed a true copy in a sealed envelope or
26 package addressed to the persons as indicated above, on the above-mentioned
27 date, and placed the envelope for collection and mailing, following our
28 ordinary business practices. I am readily familiar with this firm's practice for
collecting and processing correspondence for mailing. On the same day that
correspondence is placed for collection and mailing, it is deposited with the
U.S. Postal Service in the ordinary course of business in a sealed envelope with
postage fully prepaid. I am aware that on motion of party served, service is
presumed invalid if postal cancellation date or postage meter date is more than
one day after date of deposit for mailing set forth in this declaration.

I am a resident or employed in the county where the mailing occurred. The
envelope or package was placed in the mail at Los Angeles, California.

☒ **BY ELECTRONIC TRANSFER TO THE CM/ECF SYSTEM:** On this
date, I electronically uploaded a true and correct copy in Adobe "pdf" format
the above-listed document(s) to the United States District Court's Case
Management and Electronic Case Filing (CM/ECF) system. After the
electronic filing of a document, service is deemed complete upon receipt of the
Notice of Electronic Filing ("NEF") by the registered CM/ECF users.

☒ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and
correct.

Executed on May 20, 2022.



Rosanna Perez